

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOHNATHAN L. VEENSTRA,

Plaintiff,

v.

RELIANT CAPITAL SOLUTIONS, LLC

Defendant.

Case No. 1:20-CV-07021

Honorable Judge John F. Kness

**MOTION TO WITHDRAW AS COUNSEL**

**NOW COMES**, Counsel for Plaintiff, Mohammed O. Badwan and Victor T. Metroff of the Sulaiman Law Group, Ltd., collectively, (“Plaintiff’s Counsel”), hereby moving this Honorable Court for leave to withdraw as counsel for Johnathan L. Veenstra (“Plaintiff”), and in support thereof, stating as follows:

1. On November 25, 2020, Plaintiff filed a complaint against Defendant Reliant Capital Solutions, LLC (“Defendant”) seeking redress for violations of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692 *et seq.*
2. The parties are in the process of completing informal discovery.
3. Plaintiff’s Counsel have made numerous unsuccessful attempts to contact Plaintiff through phone calls and written correspondences.
4. Despite Plaintiff’s Counsel’s numerous attempt to contact Plaintiff, Plaintiff has been unresponsive.

5. On March 26, 2021, Plaintiff's Counsel mailed written correspondences to Plaintiff's last known address informing Plaintiff of their intent to withdraw as his counsel.

6. To date, Plaintiff has not contacted Plaintiff's Counsel.

7. Plaintiff's Counsel cannot effectively represent Plaintiff without Plaintiff's active participation in this case.

8. For the foregoing reasons, Plaintiff's Counsel submit that there is good case for the Court to permit Plaintiff's Counsel to withdraw as counsel for Plaintiff.

9. In the event the Court would like to contact Plaintiff, Plaintiff's last known address is 126 Rick Court Oswego, IL 60543. Furthermore, Plaintiff's last known phone number is (630) 550-2046.

**WHEREFORE**, Plaintiff's Counsel request that this Court enter an Order granting the Motion to Withdraw as counsel for Plaintiff Johnathan L. Veenstra, as for any other such relief the Court deems just and appropriate.

Respectfully submitted,  
/s/ Mohammed O. Badwan.  
/s/ Victor T. Metroff  
Victor T. Metroff  
Mohammed O. Badwan  
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**CERTIFICATE OF SERVICE**

I, Mohammed O. Badwan, certify that on May 5, 2021, I caused the foregoing to be served upon counsel of record through operation of the Court's Case Management/Electronic Case File (CM/ECF) system.

/s/ Mohammed O. Badwan